USA Comments AAHC REPORT - AUG 2005

CHAPTER 2.1.10.

EPIZOOTIC ULCERATIVE SYNDROME

Article 2.1.10.3.

Commodities

country.

| 1. | Aut | When authorising import or transit of the following <i>commodities</i> , <i>Competent Authorities</i> should not require any EUS related conditions, regardless of the EUS status of the <i>exporting country</i> , <i>zone</i> or <i>compartment</i> : | | |
|----|------|---|---|--|
| | a) | | | |
| | | i) | | |
| | | ii) | | |
| | b) | The following products destined for human consumption ¹ from species in Article 2.1.10.2 which have been prepared in such a way to minimise the risk of diversion for alternative uses: | | |
| | | i) | Chemically Preserved products (e.g. smoked, salted, pickled, marinated, etc); | |
| | | ii) | | |
| | | iii) | | |
| | | iv) | | |
| | | v) | | |
| | c) | ••• | | |
| 2. | | | | |
| 3. | in A | When considering the import or transit of any live <i>commodity</i> of a species not listed in Article 2.1.10.2. from an <i>exporting country</i> , <i>zone</i> or <i>compartment</i> not declared free of EUS, <i>Competent Authorities</i> of the <i>importing country</i> should conduct an analysis of the risk of introduction, establishment and spread of <i>A. invadans</i> , and the | | |

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potential consequences; associated with importation of the *commodity*, prior to a decision. The outcome of this assessment should be made available to the *exporting*

Rationale:

Article 2.1.10.3 1)b)i): Smoking and freeze drying are physical (not chemical) processes.

Article 2.1.10.4.

EUS free country

A country may declare itself free from EUS if it meets the conditions in points 1), 2), 3) or 4) below.

If a country shares a *zone* or *compartment* with one or more other countries, it can only declare itself an EUS free country if all the areas covered by the shared water are declared EUS free countries or zones (see Article 2.1.10.5.).

1. ...

OR

2. A country where the species listed in Article 2.1.10.2. are present but there has never been any observed occurrence of the disease for at least the past 25 years despite conditions that are conducive to its clinical expression, as *described* in Chapter X.X.X. of the *Aquatic Manual*, may declare itself free from EUS when *basic biosecurity conditions* have been met continuously in the country for at least the past 10 years.

OR

3. ...

OR

4. ...

General Comment :Article 2.1.10.4 2) How was 25 years determined to be the appropriate length of time?

Articles 2.1.10.7 and 2.1.10.10

The sentence in each of these articles which reads:

"The certificate shall should be in accordance with the Model Certificate in Appendix 6.3.2.."

Comment: Recommend replacing the word "shall" with "should" as it is a more appropriate term when referring to a recommended procedure.